

1 NATHAN DOOLEY (SBN 224331)  
2 COZEN O'CONNOR  
3 601 S. Figueroa Street, Suite 3700  
4 Los Angeles, CA 90017  
5 Tel.: 213.892.7933  
6 Fax: 213.892.7999  
7 NDooley@cozen.com

8  
9 *Attorneys for Specially Appearing Defendants*  
10 *Chicken Soup for the Soul Entertainment, Inc. and*  
11 *TOFG, LLC*

12  
13  
14 UNITED STATES DISTRICT COURT  
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 DUSTIN NEFF, an individual  
17 Plaintiff,

18 v.

19 SBA ENTERTAINMENT, LLC, a Colorado  
20 Limited Liability Company; GOOD  
21 ENTERPRISE SOLUTIONS INC., a Colorado  
22 Corporation; CHICKEN SOUP FOR THE  
23 SOUL ENTERTAINMENT, INC., a Delaware  
24 Corporation; TOFG LLC d/b/a 1091, a  
25 Delaware Limited Liability Company; and  
26 DOES 1-10, Inclusive,

27 Defendants;

28  
Case No.: 3:23-cv-02518-JD  
The Honorable James Donato

**SPECIALLY APPEARING  
DEFENDANTS CHICKEN  
SOUP FOR THE SOUL  
ENTERTAINMENT, INC.  
AND TOFG, LLC'S  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
RESPOND TO FIRST  
AMENDED COMPLAINT  
[CIVIL L.R. 6-3(A)]**

**(First Request)**

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 Pursuant to Civil L.R. 6-3(a), Specially Appearing Defendants Chicken Soup for  
 3 the Soul Entertainment, Inc. and TOFG, LLC (“Defendants”), by and through  
 4 undersigned counsel, hereby respectfully requests that the Court issue an order  
 5 enlarging the time for Defendants to respond to the First Amended Complaint (“FAC”)  
 6 (Doc. 38). Specifically, Defendants’ requests a thirty (30) day extension, which would  
 7 make Defendants’ response due by July 22, 2024.

8 Shortly after Defendants received a copy of the FAC and retained counsel, and  
 9 on the same day of learning when the response to the FAC was due, Defendants’ counsel  
 10 emailed and called Plaintiff’s counsel to request a stipulation to extend the deadline for  
 11 Defendants to respond to the FAC by thirty days. *See* Declaration of Nathan Dooley ¶  
 12 4. Plaintiffs’ counsel did not respond, but advised through their paralegal assigned to  
 13 this case that they would not oppose this Motion. *See id.* ¶ 5.

14 Defendants request this extension in order to have sufficient time to investigate  
 15 Plaintiff’s allegations, and to explore the potential for a resolution of this matter.  
 16 Defendants would be substantially harmed and prejudiced if it were required to respond  
 17 to the FAC without the opportunity to complete its initial investigation and to confer  
 18 with Plaintiff. Defendants are specially appearing to file this Motion in order to  
 19 preserve its jurisdictional defenses in this matter, including, among other things, its  
 20 defense for lack of personal jurisdiction and insufficient service of process.

21 There have not been any previous time modifications in this case, whether by  
 22 stipulation or by Court order, and extending the deadline for Defendants to respond to  
 23 the Complaint would not have any effect on the schedule for the case.

24  
 25 Dated: June 20, 2024

**COZEN O’CONNOR**  
 26 Nathan Dooley

27 By: s/Nathan Dooley  
 28 Nathan Dooley

1  
2 *Attorneys for Specially Appearing*  
3 *Defendants Chicken Soup for the Soul*  
4 *Entertainment, Inc. and TOFG, LLC*

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies, under penalty of perjury under the laws of the State of California that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Scott Alan Burroughs  
Frank R. Trechsel  
DONIGER / BURROUGHS  
603 Rose Avenue  
Venice, CA 90291  
Telephone: (310) 590-1820  
Email: [scott@donigerlawfirm.com](mailto:scott@donigerlawfirm.com)  
[ftrechsel@donigerlawfirm.com](mailto:ftrechsel@donigerlawfirm.com)

Valerie Yanaros  
Yanaros Law, P.C. Texas  
8300 Douglas Ave., Ste 800  
Dallas, TX 75225  
Telephone: (512) 826-7553  
Email: [valerie@yanaroslaw.com](mailto:valerie@yanaroslaw.com)

Attorneys for Defendant Goode  
Enterprise Solutions Inc.

*Attorneys for Plaintiff Dustin Neff*

s/Nathan Dooley  
Nathan Dooley